

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO: 3:23CR-00054
)	
Plaintiff,)	JUDGE JAMES R. KNEPP, II
)	
v.)	<u>NOTICE OF REQUEST</u>
)	<u>FOR DISCOVERY</u>
BRYAN PERRY,)	
)	
Defendant.)	

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the Defendant requests discovery and inspection with the right to copy or photograph, where appropriate, the following materials:

1. Pursuant to Rule 16(a)(1)(A), the substance of all oral statements made by Defendant.
2. Pursuant to Rule 16(a)(1)(B), all written or recorded statements of Defendant.
3. Pursuant to Rule 16(a)(1)(D), a copy of the Defendant's prior criminal record.
4. Pursuant to Rule 16(a)(1)(E), all documents, photographs, and other tangible objects, or copies of portions thereof that (i) is material to preparing the defense; (ii) the Government intends to use in its case in chief at trial; (iii) the item was obtained from or belongs to defendant. This request encompasses the following non-exclusive list of evidentiary items:
 - a. **Any and all dash camera and body camera footage from ALL responding law enforcement officers.**
 - b. **Any and all signed *Miranda* forms or consent to search forms**
 - c. **Any and all police reports from ALL responding law enforcement officers.**

d. Any and all Cellebrite extractions or other digital forensic extractions or examinations performed.

5. Pursuant to Rule 16(a)(1)(F), all reports of physical and mental examination and of any scientific test or experiment.
6. Pursuant to Rule 16(a)(1)(G), the name(s) of any expert witness and the requisite summary of testimony the Government intends to utilize as evidence in chief at trial.
7. All evidence favorable to the Defendant on the issues of guilt or punishment.

In addition to the above request, Defendant respectfully requests the following additional items:

- A. Pursuant to Brady v. Maryland, 373 U.S. 83 (1963), I hereby request that I be provided with any exculpatory material which exists in this case relating to guilt and/or punishment. Should there be a question with regard to whether certain information constitutes Brady material, the information should be presented to the Court for view in camera to determine whether it should be produced.
- B. Pursuant to F.R.C.P. 26.2, I would request pretrial production of Jencks material. If pretrial Jencks is produced by the government, the defendant is willing to reciprocate in kind.
- C. Please provide me with notice of any evidence which you intend to introduce pursuant to Federal Rule of Evidence 404(b).
- D. Pursuant to Rule 12(b)(4)(B) of the Federal Rules of Criminal Procedure, I hereby request notice of which evidence the government intends to use in its case-in-chief.

Respectfully submitted,

Stephen Newman
Federal Public Defender
Ohio Bar: 0051928

s/ Donna M. Grill
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